

LAW OFFICES OF
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May 16, 2022

VIA ECF

MEMO ENDORSED

Hon. Laura Taylor Swain
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-0424

Re: United States of America v. Jermaine Anderson, 19-CR-023 (LTS)

Dear Judge Swain,

I represent Jermaine Anderson in the above-referenced case. I write to request a 90-day extension of Mr. Anderson's surrender date currently scheduled for May 19, 2022. I respectfully request this extension because Mr. Anderson is undergoing continued medical treatment related to a stroke last past summer. The Government consents to this request.

Mr. Anderson suffered a stroke on June 15, 2021. The stroke left half of his body numb and he is continuing extensive physical, occupational and speech therapy at Good Shepard Rehabilitation in Allentown, Pennsylvania. Mr. Anderson has transmitted a copy of letters from his treating doctors and executed HIPAA waivers for the government to monitor his progress. His treating physician, Ayanna Kersey-McMullen writes that Mr. Anderson has made substantial efforts towards recovery and has progressed tremendously. The main issue before Mr. Anderson now is weaning off insulin. Since the stroke he has been taking a high amount of daily insulin to manage his diabetes. The high level of insulin in combination with the lingering effects of his stroke profoundly affected Mr. Anderson in numerous ways, including making it difficult to stand without assistance.

Last week, Mr. Anderson's primary care physician, Dr. Ali Tahir, removed him from daily insulin in favor of a pill with far less side effects. Dr. Tahir informs me that it will take approximately three months to assess whether Mr. Anderson's body is properly tolerating the new medication regime. Specifically, Mr. Anderson's A1C levels require that amount of time to stabilize in order to be retested. At that point, Dr Tahir can determine whether Mr. Anderson can remain off insulin or will

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need to take insulin permanently. Mr. Anderson's follow-up appointment is currently scheduled for August 12, 2022.

For the above reasons, I respectfully request that Mr. Anderson's surrender date be extended 90 days. I thank the Court for your consideration of this request.

Very truly yours,

A handwritten signature in black ink, appearing to read 'DMG', with a long horizontal stroke extending to the right.

Daniel A. McGuinness

Cc: AUSA Nicholas Chiuchiolo (via ECF)

The foregoing extension request is granted. Mr. Anderson shall surrender on August 18, 2022. Dkt. no. 92 resolved.

SO ORDERED.

5/16/2022

/s/ Laura Taylor Swain, Chief USDJ